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DECL. OF SCOTT R. KAUFMAN ISO MOTION FOR ATTY'S FEES AND COSTS

1 I, Scott R. Kaufman, declare that I am an attorney licensed and in good
 2 standing in the State of California, and if called as a witness, I would competently
 3 testify that the following is true and correct.

4 1. I have been a practicing attorney for 25 years during which I have represented
 5 thousands of consumers throughout the state of California in lemon law and auto fraud matters.

6 2. I recently served for eight years as the California chair for the National Association
 7 of Consumer Advocates (“NACA”) and have taught several continuing legal education courses
 8 to other consumer attorneys in the areas of lemon law and auto fraud and have spoken at
 9 nationwide conferences in these fields.

10 3. My hourly rate of \$795 was expressly approved as reasonable in a contested fee
 motion in *Badani v. Mercedes-Benz USA, LLC*, RG21107062 on February 08, 2023. A true and
 correct copy of the opinion in that matter is attached as **Exhibit A**.

4. My firm’s associate attorney with 9 years of practice, and approximately 6 years of
 auto warranty practice, billed at \$525 per hour and his rate was also expressly approved as
 reasonable in that matter.

5. My understanding is that Daniel LeBel has spent his entire time as an attorney—
 close to 18 years—litigating under the Song Beverly Consumer Warranty and Consumer Legal
 Remedies Acts both on a class and individual basis. I have conferred with Mr. LeBel on multiple
 occasions regarding cases I have retained and on cases that I consider referring to him. I have
 found him to be an honest, hard-working, bright and dedicated consumer advocate, among the
 best of the best in this area of law.

6. Based on my experience and knowledge of this area of law and familiarity
 with Mr. LeBel and his work, his rate of \$675.00 is more than reasonable here.

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1 I declare under penalty of perjury under the laws of California, that the foregoing is
2 true and correct.

3 This declaration was executed at ___Los Altos_____, California.
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5 Dated: February 8, 2024.
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8 SCOTT R. KAUFMAN
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10 CONSUMER LAW PRACTICE OF DANIEL T. LEBEL
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